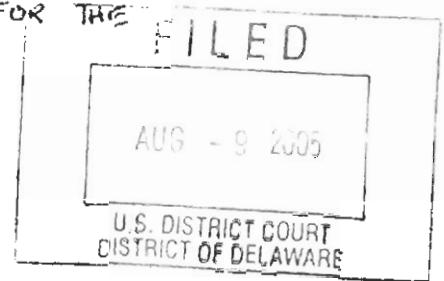


IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF DELAWARE



ERNEST A. CRUMP, JR.,
PLAINTIFF,

v.

C.A. NO. 04-329-SLR

ROBERT MAY
ET AL
DEFENDANTS.

PLAINTIFF'S FIRST SET OF INTERROGATORIES TO
DEFENDANT VINCE BIANCA

TO THE DEFENDANT, VINCE BIANCA,
YOU ARE HEREBY NOTIFIED TO ANSWER UNDER OATH, THE INTERROGATORIES
NUMBERED 1 TO 11, INCLUSIVE AS SHOWN BELOW, WITHIN 30 DAYS
OF THE TIME OF SERVICE IS UPON YOU, IN ACCORDANCE WITH RULE
33 OF THE FEDERAL RULES OF CIVIL PROCEDURES.

INTERROGATORY NO. 1. ISN'T IT TRUE THAT WHEN THE PLAINTIFF
WAS APPREHENDED ON 8-29-02 BY ROBERT MAY, THOMAS RYGIL AND
THE EMERGENCY RESPONSE TEAM AND RETURNED TO MORRIS COMMUNITY
CORRECTIONAL CENTER, YOU WERE THERE UPON HIS ARRIVAL OR ARRIVED
SHORTLY THEREAFTER HIS ARRIVAL ?.

INTERROGATORY NO. 2. ISN'T IT TRUE THAT BY YOUR ORDER
AND DIRECTIVE, ON 8-30-02 THE PLAINTIFF WAS ADMINISTRATIVELY
TRANSFERRED FROM MORRIS COMMUNITY CORRECTIONAL CENTER TO
DELAWARE CORRECTIONAL CENTER ?.

INTERROGATORY NO. 3. ISN'T IT TRUE THAT ROBERT MAY FILED AND OBTAINED A WARRANT ON 8-24-02 FOR THE PLAINTIFFS ARREST FOR ESCAPE AFTER CONVICTION ?

INTERROGATORY NO. 4. ISN'T IT TRUE THAT EVENTHOUGH THE PLAINTIFF WAS APPREHENDED BY ROBERT MAY, THOMAS RYGIL AND THE EMERGENCY RESPONSE TEAM ON 8-24-02, SAID WARRANT WASN'T EXECUTED UNTIL 9-05-02 ?

INTERROGATORY NO. 5. ISN'T IT TRUE THAT ON 8-30-02, THE DAY OF THE PLAINTIFFS ADMINISTRATIVE TRANSFER TO D.C.C., HE HAD NOT BEEN OFFICIALLY CHARGED WITH ESCAPE ?

INTERROGATORY NO. 6. ISN'T IT TRUE THAT SINCE THE PLAINTIFF WAS A RESIDENT AT MORRIS COMMUNITY CORRECTIONAL CENTER AT THE TIME OF THE ESCAPE WARRANT, AND WAS RETURNED BACK TO THE CENTER 5 HOURS LATER, AND SPENT THAT NIGHT AND ALSO THE PARTIAL MORNING OF THE NEXT DAY THERE, AND WAS NOT FORMALLY AND OFFICIALLY CHARGED UNTIL 6 DAYS LATER, THAT TECHNICALLY, HE WAS STILL A RESIDENT AT YOUR CENTER WHEN YOU HAD HIM ADMINISTRATIVELY TRANSFERRED TO D.C.C. ON 8-30-02 ?

INTERROGATORY NO. 7. ISN'T IT TRUE, THAT WHENEVER A INMATE IS TRANSFERRED TO ANOTHER CORRECTIONAL FACILITY AND WILL NOT BE RETURNING BACK TO THE FACILITY HE WAS TRANSFERRED FROM, ALL HIS PROPERTY, INCLUDING HIS KORAN AND KOFI, WHICH ALLOWS HIM TO EXERCISE HIS RELIGION, IS SUPPOSE TO BE INVENTORIED BY THE SENDING INSTITUTION AND THEN TRANSFERRED ALONG WITH THAT INMATE TO THE RECEIVING INSTITUTION ?

INTERROGATORY NO. 8. ISN'T IT TRUE THAT WHEN THE PLAINTIFF WAS TRANSFERRED FROM MORRIS COMMUNITY CORRECTIONAL CENTER ON 8-30-02, TO DELAWARE CORRECTIONAL CENTER, NONE OF HIS PERSONAL PROPERTY, INCLUDING HIS HOLY KORAN AND KUFI WERE TRANSFERRED ALONG WITH HIM, NOR CAME AT A LATER TIME ?

INTERROGATORY NO. 9. ISN'T IT TRUE THAT YOU RECEIVED 2 LETTERS FROM THE PLAINTIFF, ONE DATED 9-12-02 AND THE OTHER ONE DATED 9-22-02, IN REFERENCE TO HIS PERSONAL PROPERTY BEING TRANSFERRED ALONG WITH HIM FROM MORRIS COMMUNITY CORRECTIONAL CENTER TO DELAWARE CORRECTIONAL CENTER ?

INTERROGATORY NO. 10. ISN'T IT TRUE THAT YOU NEVER CORRESPONDED BACK TO THE PLAINTIFF IN REFERENCE TO HIS 2 LETTERS SENT TO YOU ABOUT HIS PROPERTY ?

INTERROGATORY NO. 11. ISN'T IT TRUE THAT THE PLAINTIFF'S PERSONAL PROPERTY, AT THE VERY LEAST, HIS HOLY KORAN AND KUFI, COULD HAVE BEEN TRANSFERRED ALONG WITH HIM WHEN YOU HAD HIM ADMINISTRATIVELY TRANSFERRED TO D.C.C. ON 8-30-02 ?

DATED : 06-27-05

Donald A. Campbell
PLAINTIFF
DELAWARE CORRECTIONAL CENTER
1181 PADDICK ROAD
SMYRNA, DE. 19977